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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z.
GRINGER IN SUPPORT OF
DEFENDANT'S ADMINISTRATIVE
MOTION TO SEAL**

Judge: Hon. James Donato

1 I, David Z. Gringer, declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Meta
3 Platforms, Inc. in the above-captioned action. I have personal knowledge of the matters stated
4 herein and, if called upon, I could and would competently testify thereto.

5 2. Pursuant to Local Rule 79-5, I submit this Declaration in support of Meta's
6 Administrative Motion to File Under Seal Portions of Defendant's Motion to Dismiss the First
7 Amended Consolidated Advertiser Class Action Complaint.

8 3. Meta's Motion to Dismiss discusses the First Amended Consolidated Advertiser
9 Class Action Complaint ("FAC") at length, including a portion that references information Meta
10 designated as "Confidential" or "Highly Confidential" under the Stipulated Protective Order, Dkt.
11 111, and that Meta has sought to maintain under seal, *see* Dkt. 244, as the information from the
12 FAC referenced in Meta's Motion to Dismiss consists of non-public information regarding specific
13 terms of contracts with business counterparties which, if revealed to competitors or counterparties,
14 could cause competitive harm to Meta. *See* Khurana Decl., ¶¶ 7, 8, Dkt. 244-1.

15 4. Attached to this declaration is an unredacted version of Meta's Motion to Dismiss
16 the First Amended Consolidated Advertiser Class Action Complaint.

17 5. Pursuant to Paragraph 31 of the Court's Standing Order for Civil Cases, Meta will
18 file a combined Motion to Seal promptly after briefing on its Motion to Dismiss is complete and
19 will work in good faith to minimize the amount of material sought to be sealed to ensure it is
20 narrowly tailored to balance the right of public access to the record.

21 I declare that the foregoing is true and correct under penalty of perjury.

22 Executed on this 21 day of March, 2022, in New York, New York.

23
24 By: /s/ David Z. Gringer
25 David Z. Gringer
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing.
Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that the other signatories have concurred in
this filing.

Dated: March 21, 2022

By: /s/ Sonal N. Mehta

Sonal N. Mehta